

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

HELEN RUNGE,

*Plaintiff,*

v.

WALTER J. KELLEY; KERRY L.  
BLOOMINGDALE, M.D.; and  
SUNBRIDGE NURSING AND  
REHABILITATION CENTER,

*Defendants.*

Civil Action No. 05-10849-RGS

**RESPONSE of DEFENDANT SUNBRIDGE to PLAINTIFF'S MOTION  
for ENLARGEMENT of TIME to SUBMIT EXPERT REPORT**

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In her motion, the Plaintiff asks this Court for an enlargement of the time for her submission of expert reports as to defendant SunBridge. As grounds for her motion the Plaintiff notes that certain documents related to her residence at SunBridge have not been produced in discovery. While Defendant SunBridge has produced 485 pages of documents, including Plaintiff Runge's medical file, the nursing home at issue in this litigation is no longer owned by Defendant Mediplex of Massachusetts, Inc. d/b/a SunBridge Care and Rehabilitation for Randolph. The Defendant is working with the new owners in order to secure the remaining portion of the Resident's file.

Following discussions with Plaintiff's counsel, counsel for SunBridge concurs with granting the requested extension of time for Plaintiff's expert disclosure with regard to her claims against SunBridge so long as SunBridge would be permitted 30 days after Plaintiff's expert submission to submit its expert report.

Respectfully submitted,

**Mediplex of Massachusetts, Inc. d/b/a  
SunBridge Care and Rehabilitation for  
Randolph**

by its attorneys,

/s/ Michael Williams

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**CERTIFICATE OF SERVICE**

I hereby certify that this Document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on January 3, 2006.

/s/ Michael Williams